



OFFICE OF
CHIEF COUNSEL

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Steven A. Musher
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: October 5, 2007

SUBJECT: APA Quarterly Report for FY 2007,
Fourth Quarter Ending 09/30/07

The following are the APA Program's results for the fourth quarter of FY 2007 ("Q4").

APAs Completed

The APA Program completed 25 APA matters in Q4, consisting of 17 bilateral APAs, 3 unilateral APAs, and 5 amendments.

Negotiating Position Papers

The APA Program completed 16 bilateral negotiating position papers in Q4.

Annual Reports

The APA Program completed its review of and closed 55 annual reports in Q4.

New Matters

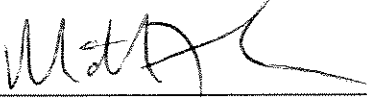
The APA Program received 34 new APA matters in Q4, consisting of 23 bilateral matters and 11 unilateral APA matters.

APA Inventory

The APA Program has an ending inventory of 251 open matters.¹ This consists of 210 bilateral and 41 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of September 30, 2007. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,



Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

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1. This equals beginning Q4 inventory of 242 matters, plus 34 receipts, less 25 closures { $242 + 34 - 25 = 251$ }.
 2. The 251 open matters include 29 pending dollar filings (18 bilateral and 11 unilateral).
Thus
 - The APA Program has an inventory of 222 active cases, i.e., 251 open matters less 29 pending dollar filings.
 - The 222 active cases consist of 192 bilateral cases (210 total bilateral matters less 18 pending bilateral dollar filings) and 30 unilateral cases (41 total unilateral matters less 11 pending unilateral dollar filings).
 - The APA Program has forwarded 115 of the 192 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 107 cases, consisting of 77 bilateral cases (192 active bilateral cases less 115 forwarded to Competent Authority) and 30 active unilateral cases.
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